	THOMAS W. MARONEY, ESQ.		
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5	Attorneys for Defendant		
6	The Barajas Group		
7	UNITED STATES DISTRICT COURT		
8	DISTRICT OF NEVADA		
9	TRUSTEES OF THE OPERATING ENGINEERS PENSION TRUST;		
10	TRUSTEES OF THE OPERATING ENGINEERS HEALTH AND WELFARE	Case No.: 2:24-cv-01410-APG-NJK	
11	FUND; TRUSTEES OF THE OPERATING ENGINEERS JOURNEYMAN AND		
12	APPRENTICE TRAINING TRUST; AND TRUSTEES OF THE OPERATING		
13	ENGINEERS VACATION HOLIDAY SAVINGS TRUST.	STIPULATION TO EXTEND DEADLINE	
14	Plaintiffs,	FOR DEFENDANT TO RESPOND TO PLAINTIFF'S COMPLAINT	
15	VS.	(SECOND REQUEST)	
16	THE BARAJAS GROUP, a Nevada		
17	Corporation,		
18	Defendant.		
19	IT IS HEREBY STIPULATED by and between Plaintiffs Trustees of the Operating		
20	Engineers Pension Trust, Trustees of the Operating Engineers Health and Welfare Fund, Trustees		
21	of the Operating Engineers Journeyman and Apprentice Training Trust, and Trustees of the		
22	Operating Engineers Vacation Holiday Savings Trust, ("Plaintiffs"), through their counsel, the law		
23	firm of Laquer, Urban, Clifford, and Hodge LLP, and Defendant, The Barajas Group		
24	("Defendant"), by and through its counsel, the law firm of Jackson Lewis P.C., that Defendant shal		
25	have an extension up to and including November 7, 2024, in which to file its response to Plaintiff's		
26	Complaint. This Stipulation is submitted and based upon the following:		
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- 1. Plaintiffs filed their Complaint on August 1, 2024 in the United States District Court, District of Nevada, Case No. 2:24-cv-01410-APG-NJK. The Summons and Complaint were served on or about August 6, 2024.
- 2. On September 12, 2024, the Parties filed their first request for an extension of time for Defendant to file a response to Plaintiff's Complaint to September 27, 2024.
- 3. Although the Court noted that Defendant was not represented by legal counsel at the time, the request was granted.
 - 4. Defendant subsequently retained the undersigned law firm as counsel in this matter.
- 5. As Defendant's counsel was recently retained, counsel needs sufficient time to investigation the allegations in the Complaint, confer with Defendant's representatives, and prepare Defendant's response to the Complaint.
- 6. This is the second request for an extension of time for Defendant to file a response to Plaintiff's Complaint.
 - 7. This Stipulation is made in good faith and not for the purpose of delay.

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1	8. Nothing in this Stipulation and Order shall operate to waive, relinquish, or impair			
2	any claim, defense, objection, or right of any party in this case. Further, nothing in this Stipulation			
3	and Order shall be construed as an admission of or consent to the merit or validity of any claim,			
4	defense, objection, or right by any party in this case.			
5	Dated this 10th day of October, 2024			
6 7	LAQUER, URBAN, CLIFFORD & HODGE LLP	&	JACKSON LEWIS P.C.	
8	/s/ Michael Urban MICHAEL URBAN, ESQ. Nevada Bar No. 3875		/s/ Thomas W. Maroeny THOMAS W. MARONEY, ESQ. Nevada Bar No. 13913	
9 10	4270 South Decatur Blvd., Suite A Las Vegas, Nevada 89103	9	300 S. Fourth Street, Suite 900 Las Vegas, Nevada 89101	
11	Attorneys for Plaintiffs		Attorneys for Defendant	
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15	NO FURTHER EXTENSIONS WILL BE GRANTED.	<u>ORDER</u>		
16		IT IS SO ORDI	ERED.	
17	United States M Dated: Octobe		Magistrate Judge	
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19		Dated:		
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